

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ADRIAN SCHOOLCRAFT,

10CV6005(RWS)

Plaintiff,

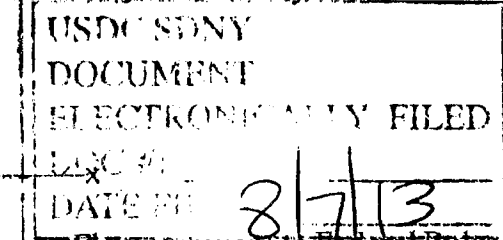
Rule 26(f)(3)

-against-

~~Amended Discovery Plan~~

THE CITY OF NEW YORK, et al.,

Defendants.



The parties submit the following Amended Discovery Plan, pursuant to Federal Rules

of Civil Procedure Rule 26(f)(3).

1. The continued deposition of the plaintiff by Mauriello/City will be held on: August 26, 2013. The deposition of the plaintiff by the medical defendants shall be held on: August 27, 2013. Each deposition shall consist of a maximum of seven hours of actual testimony time.

2. The depositions of the defendants shall be held as follows. Each deposition shall consist of a maximum of seven hours of actual testimony time.

Party Witnesses

Date of deposition

Deputy Chief Michael Marino:

August 29, 2013

Deputy Inspector Steven Mauriello:

September 10, 2013

Captain Theodore Lauterborn:

TBA between September 30 and October 3

Lieutenant Timothy Caughey:

TBA between September 30 and October 3

Dr. Isak Isakov:

September 27, 2013

Dr. Aldana-Bernier:

September 20, 2013

Jamaica Hospital Medical Center:

Notice to be served by plaintiff for 30(b)(6) depositions

Each deposition shall consist of a maximum of seven hours of actual testimony time. Each party maintains the right to apply to the court for additional time if this is deemed necessary

by that party. It is further understood that these dates are subject to slight adjustments due to scheduling conflicts that may arise and due to the availability of witnesses.

3. Depositions of Non-Party witnesses by subpoena.

| <u>Non-Party Witnesses:</u> | <u>Date of Deposition</u> |
|-----------------------------|---|
| Catherine Lamstein Psy.D: | To be arranged (subpoena to be served by plaintiff) |
| Larry Schoolcraft | October 8, 2013 (subpoena to be served by City) |

4. The handling of confidential and attorneys' eyes only confidential and/or privileged information continues to be controlled by the Stipulation and Protective Order and Attorneys' Eyes Only Stipulation and Protective Order so-ordered by the Court on October 3, 2012.

5. Local Rule 33.3(c) interrogatories seeking the claims and contentions of the opposing parties shall be served after the depositions of the parties are completed. Plaintiff will respond thereto within twenty days and defendants will respond within twenty days after the plaintiff's response.

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6. Fact discovery shall be completed by December 20, 2013.

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7. Any expert disclosure not previously made, and the depositions of experts, shall be scheduled for the ^{two}~~three~~ months after the fact discovery is completed. Plaintiff's expert disclosure shall be made by January 17, 2014 and defendants' expert disclosure shall be made by February 18, 2014. Depositions of plaintiff's expert(s) shall be completed by February 21, 2014 and depositions of defendants' experts shall be completed by March 5, 2014.

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~~8. Expert discovery shall be completed by March 20, 2014.~~

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9. Any dispositive motions shall be served by April 19, 2014.

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10. All dates in this discovery plan are subject to modification. It is expressly understood that the dates for expert discovery are preliminary and may change.

11. This document may be executed in counterparts, and signatures transmitted by facsimile or other electronic means shall have the same force and effect as if signed in the original.

Dated: New York, New York
July 31, 2013

*S. ordered
Sweet VS Dr
8.5.13*

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